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**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

RICKY BUTLER, an individual,

Plaintiff,

v.

COUNTY OF SAN BERNARDINO,  
DEPUTY GUYON FOXWELL and  
DOES 1 through 10, inclusive,

Defendants.

Case No. 5:23-cv-02147 RGK (Ex)

**NOTICE OF SETTLEMENT AND  
REQUEST TO VACATE ALL DATES**

*Before the Honorable R. Gary Klausner*

**TO THIS HONORABLE COURT AND TO ALL PARTIES AND THEIR  
ATTORNEYS OF RECORD:**

**PLEASE TAKE NOTICE** that the parties have reached a settlement in this matter,  
which will resolve this entire action.

1 The settlement is between Plaintiff and Defendants, including San Bernardino  
2 County, whose Board of Supervisors approved the settlement on September 10, 2024. The  
3 parties are executing the settlement documents. Counsel for the parties estimate that it will  
4 take approximately 30 days to issue payment pursuant to the settlement agreement.

5 The entire case shall be dismissed with prejudice upon the execution of the  
6 settlement agreement. The parties shall file a Joint Stipulation to dismiss all claims within  
7 thirty (30) days. Accordingly, the parties, by and through their counsel of record,  
8 respectfully request that the Court vacate all pending dates. The parties request that the  
9 Court retain jurisdiction over this matter until the settlement agreement is executed and  
10 the parties file a formal stipulation of dismissal.

11  
12 Respectfully submitted,

13  
14 DATED: September 11, 2024

**PLC LAW GROUP, APC**

15 /s/ Na'Shaun L. Neal

16 Peter L. Carr, IV

17 Na'Shaun L. Neal

18 Lauren McRae

Attorneys for Plaintiff, Ricky Butler

19  
20 DATED: September 11, 2024

**TOM BUNTON**

County Counsel

21  
22 /s/ Adam Miederhoff

23 **ADAM MIEDERHOFF**

24 Deputy County Counsel

25 Attorneys for Defendants,

San Bernardino County and Guyon Foxwell

**SIGNATURE CERTIFICATION**

Pursuant to Section 2(f)(4) of the Electronic Case Filing Administrative Policies & Procedures Manual, I hereby certify that the contents of this document are acceptable to Adam Miederhoff, counsel for Defendants, and that I have obtained her authorization to affix her electric signature to this document.

Dated: September 11, 2024

/s/Na'Shaun L. Neal  
Na'Shaun L. Neal